

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: Debra Davie
Joseph Davie**

Debtor(s)

PNC BANK, NATIONAL ASSOCIATION

Movant

vs.

Scott F. Waterman,

Respondent(s)

BK NO. 23-10103 AMC

Chapter 13

Related to Document No. 34

**RESPONSE TO DEBTOR'S APPLICATION TO SELL REAL PROPERTY
FREE AND CLEAR OF LIENS**

PNC Bank, National Association enters its response to the Debtor's Application to Sell Real Property Free and Clear of Liens.

1. Creditor's loan is secured by a mortgage on Debtor's property at 220 Willow Road, Wallingford, PA 19086.

2. Creditor would not object to the sale so long as the Order entered is clear that the sale is not free and clear of secured creditors lien and same shall remain on the property until such time that it is paid in full. The Creditor filed a total debt Proof of Claim on March 24, 2023, in the amount of \$81,834.95. Debtor is required to obtain a proper payoff quote from the Creditor prior to closing.

WHEREFORE, the Movant, PNC Bank, National Association, prays that the Court enters an Order requiring the Secured Creditor to be paid in full.

Respectfully submitted,

Date: May 9, 2023

/s/ Denise Carlon
Denise Carlon, Esquire
Attorney I.D. No. 001392008
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106
Phone: 215-627-1322
dcarlon@kmlawgroup.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Debra Davie
Joseph Davie**

Debtor(s)

**PNC BANK, NATIONAL
ASSOCIATION**

Movant

vs.

**Debra Davie
Joseph Davie**

Debtor(s)

Scott F. Waterman,

Trustee

BK NO. 23-10103 AMC

Chapter 13

Related to Document No. 34

CERTIFICATE OF SERVICE

I, Denise Carlon of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on May 10, 2023, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)
Debra Davie
220 Willow Road
Wallingford, PA 19086

Joseph Davie
220 Willow Road
Wallingford, PA 19086

Attorney for Debtor(s) (via ECF)
John L. McClain, Esq.
John L McClain & Associates, PC
P.O. Box 123
Narberth, PA 19072

Trustee (via ECF)
Scott F. Waterman
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

Method of Service: electronic means or first-class mail

Dated: May 10, 2023

/s/ Denise Carlon
Denise Carlon, Esquire
Attorney I.D. No. 001392008
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106
Phone: 215-627-1322
dcarlon@kmlawgroup.com